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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JOSEPH GIULIANO,

Defendant.

Case No. 2:14-cr-371-JCM-DJA

SIXTEENTH STIPULATION TO
CONTINUE SENTENCING

The United States of America, through Jason M. Frierson, United States Attorney, and Daniel J. Cowhig, Assistant United States Attorney, and the defendant Joseph Giuliano, by and through his counsel, Shawn R. Perez, Esq., stipulate and agree and jointly move this Honorable Court to vacate the sentencing hearing set for Wednesday, June 1, 2022, at 10:00 a.m. and reset the sentencing proceedings in this matter at a date ninety (90) days from the current setting.

The parties make this stipulation and motion for good cause and not for the purposes of delay.

The possibility remains that defendant Giuliano may be called to testify in proceedings in a related case or assist in other matters pursuant to his plea agreement. The parties agree that

1 it is in the interest of justice to defer sentencing. Defendant Giuliano believes it is in his best
2 interest to do so.

3 Defendant Giuliano is not in custody and agrees to this continuance.

4 Denial of this request for continuance could result in a miscarriage of justice.

5 This is the fifteenth request to continue sentencing in this matter.

6 The parties respectfully request this Honorable Court issue the attached proposed Order
7 to accomplish these ends.

8 Dated May 26, 2022

9 Counsel for Defendant
10 JOSEPH GIULIANO

JASON M. FRIERSON
United States Attorney

11 //s// Shawn R. Perez
12 SHAWN R. PEREZ, ESQ.
Law Offices of Shawn R. Perez

//s// Daniel J Cowhig
DANIEL J. COWHIG
Assistant United States Attorney

**UNITED STATES DISTRICT COURT
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ORDER

FINDINGS OF FACT AND CONCLUSIONS OF LAW

Based on the stipulation of the parties and the record in these matters, the Court finds that the parties make this stipulation and motion for good cause and not for the purposes of delay. The possibility remains that defendant Giuliano may be called to testify in proceedings in a related case or in other matters, pursuant to his plea agreement. The parties agree that it is in the interest of justice to defer sentencing. Defendant Giuliano believes it is in his best interest to do so.

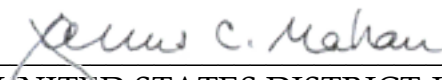
Defendant Giuliano is not in custody and agrees to this continuance.

Denial of this request for continuance could result in a miscarriage of justice.

This is the sixteenth request to continue sentencing in this matter.

ORDER

IT IS HEREBY ORDERED, on the stipulation of the parties and good cause appearing therefor, that the sentencing hearing set for Wednesday, June 1, 2022 at 10:00 a.m. be vacated and reset for **September 7, 2022, at 10:00 a.m.** in Las Vegas Courtroom 6A. **IT IS SO ORDERED** this May 27th 2022.


UNITED STATES DISTRICT JUDGE

Certificate of Service

I, Daniel J. Cowhig, hereby certify that on this day I served an electronic copy of the above
Sixteenth Stipulation to Continue Sentencing on Counsel of Record via Electronic Case
Filing (ECF).

Dated May 26, 2022

/s/ / Daniel J Cowhig

DANIEL J. COWHIG

Assistant United States Attorney